

SCHIFF HARDIN & WAITE

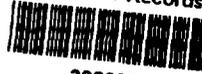
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WASHINGTON, D.C.
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PEORIA

EPA Region 5 Records Ctr.



338258

June 1, 1993

VIA MESSENGER

Sherry Estes, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Stickney Landfill Site

Dear Ms. Estes:

Enclosed are Chrysler's responses to the U.S. EPA's request for information on the Stickney Landfill Site pursuant to Section 104(e) of CERCLA. Since yesterday was Memorial Day, these responses are being delivered today.

Please note that the Verification attached to the responses is unsigned. Sheldon Zabel, one of the attorneys representing Chrysler, will be signing the Verification, but he is currently unavailable. I will forward the signed Verification to you shortly.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

Marcus A. Martin

MAM/dm

Enclosure

cc: Michael W. Grice (w/encl.)
Sheldon A. Zabel (w/encl.)
Eric L. Lohrenz (w/encl.)
Jane E. Montgomery (w/encl.)

**CHRYSLER CORPORATION'S RESPONSE TO
CERCLA SECTION 104(e) INFORMATION REQUEST
FOR STICKNEY LANDFILL SITE**

Chrysler Corporation ("Chrysler") makes the following Objections and Responses to the United States Environmental Protection Agency's request for information dated April 14, 1993 pursuant to Section 104(e) of CERCLA for the Stickney Landfill Site (as defined herein). Pursuant to Instruction No. 9, Chrysler formally requests confidentiality protection under 40 C.F.R. 2.203(b) for all information and documents contained herein and submitted in response to the Information Requests.

GENERAL OBJECTIONS

1. Chrysler objects to each Information Request to the extent that it purports to seek documents or information that Chrysler's predecessor, American Motors Corporation, submitted to U.S. EPA in August 1984 in response to the U.S. EPA's information request dated May 3, 1984 pursuant to Section 104(e) of CERCLA for the Stickney Landfill Site (the "August 1984 104(e) Response"). Resubmission of such documents or information would be unduly burdensome and costly.

2. Chrysler objects to the time period of the Information Requests, from 1958 to the present, as overbroad in that such time period includes documents or information about time periods that have no reasonable connection to the operation of the Stickney Landfill Site. As indicated in the August 1984 104(e) Response, the Stickney Landfill Site was closed to all users in 1966. As further indicated in the August 1984 104(e) Response, American Motors Corporation's only involvement with the Stickney Landfill Site was limited to that of title holder of the Stickney Landfill Site, and American Motors Corporation did not acquire legal title to the Stickney Landfill Site until 1975. Chrysler's only involvement with the Stickney Landfill Site has likewise been limited

solely to that of legal title holder. Chrysler acquired legal title to the Stickney Landfill Site in 1987 when American Motors Corporation became a wholly-owned subsidiary of Chrysler. Chrysler has no knowledge that it or any of its agents, employees or contractors ever used, purchased, stored, treated, disposed, transported, or arranged with a transporter for the treatment or disposal of, any hazardous material or hazardous substance at or to the Stickney Landfill Site. Because of the overbreadth of the time period of the Information Requests, and unless otherwise indicated in a specific Response to an Information Request, Chrysler's Responses relate only to the time period during which the Stickney Landfill Site was operated, or in other words between 1958 and 1966.

3. Chrysler objects to each Information Request that seeks information or documents beyond the scope of authority granted to U.S. EPA pursuant to 42 U.S.C. §9604(e).

4. Chrysler objects to each Information Request that calls for speculation.

OBJECTIONS TO INSTRUCTIONS

1. Chrysler objects to Instruction 3 because it is vague. Chrysler is not producing any material that is subject to the attorney-client privilege or other privilege, or material that constitutes protected attorney work-product or that is not otherwise discoverable. Chrysler also objects to Instruction 3 because it is unduly burdensome and repetitive to the extent that it seeks the same information provided in the Responses to Information Requests Nos. 1 and 2.

2. Chrysler objects to Instruction 4 to the extent that it attempts to create a continuing duty on Chrysler to supplement its Responses as described in Instruction 4 on the grounds that such a requirement exceeds the statutory authority granted to U.S. EPA pursuant to 42 U.S.C. §9604(e). Without waiving this objection, however, if Chrysler becomes aware of any information that demonstrates its Response was incorrect when made, though believed to have been correct when made, then Chrysler will voluntarily supplement its Response.

3. Chrysler objects to Instruction No. 5 because identification of each Information Request to which a document may be responsive is unduly burdensome. Documents produced in response to the Information Requests are self-explanatory and many may be responsive to more than one Information Request.

4. Chrysler objects to Instruction 6 because it is unduly burdensome and overbroad to the extent it seeks information and documents that are not in the possession, custody or control of Chrysler.

OBJECTIONS TO DEFINITIONS

1. Chrysler objects to Definition 1 because it is vague, overbroad and unduly burdensome to the extent it seeks information and documents about facilities that have no reasonable connection to the Stickney Landfill Site (as defined herein). For purposes of Chrysler's Responses, the terms "Chrysler," "Respondent" or "you" shall mean and be limited to Chrysler's manufacturing facility located at 940 North Cove Boulevard, Toledo, Ohio ("Kaiser-Jeep Plant No. 1") and Chrysler's manufacturing facility located at 3900 Stickney Avenue, Toledo, Ohio ("Kaiser-Jeep Plant No. 2"). Unless the text or context clearly indicates otherwise, the terms "Chrysler," "Respondent" or "you" shall also include Kaiser-Jeep Plant No. 1 and Kaiser-Jeep Plant No. 2 during the time periods they were owned by Chrysler's predecessors, American Motors Corporation and Kaiser-Jeep Corporation (collectively, "Jeep") to the extent Chrysler has knowledge sufficient to provide such information.

2. Chrysler objects to Definition 3 because it is vague. For purposes of Chrysler's Responses, the term "Site" shall mean and be limited to that certain parcel of real estate comprising approximately 32 acres, as legally described in, and as delineated on the map provided in, the Response to Information Request No. 11 (the "Stickney Landfill Site"). In addition, for

purposes of this Response, the term "Facility" shall mean and be limited to Kaiser-Jeep Plant No. 1 and Kaiser-Jeep Plant No. 2, as appropriate.

RESPONSES

Request No. 1: Identify all persons consulted in the preparation of the answers to these Information Requests.

Response: All people who were consulted are listed in Response No. 6, with the addition of Michael W. Grice, Chrysler Corporation, General Counsel's Office, 12000 Chrysler Drive, Highland Park, Michigan 48288-1919, phone number (313) 956-2075; Sheldon A. Zabel, Eric L. Lohrenz, Marcus A. Martin and Jane E. Montgomery, Schiff Hardin & Waite, 7200 Sears Tower, 233 South Wacker Drive, Chicago, Illinois 60606, phone number (312) 876-1000.

Request No. 2: Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Instructions Nos. 1, 2, 3 and 4.

Response: Without waiving the foregoing Objection, the August 1984 104(e) Response. All additional documents within the possession, custody or control of Chrysler that are responsive to the Information Requests are available for inspection and copying at a mutually convenient time at the office of Schiff Hardin & Waite, 7200 Sears Tower, Chicago, Illinois.

Request No. 3: If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Objection: See General Objections Nos. 1, 2, 3 and 4, and Objections to Definitions Nos. 1 and 2.

Response: Without waiving the foregoing Objection, none.

Request No. 4: List the EPA Identification Numbers of the Respondent.

Objection: See General Objections No. 3, and Objections to Definitions Nos. 1 and 2.

Response: Without waiving the foregoing Objection: Kaiser-Jeep Plant No. 1 -- OHD 048784862; Kaiser-Jeep Plant No. 2 -- OHD 048784920.

Request No. 5: Identify the acts or omissions of any person, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

Objection: See General Objections Nos. 1, 2, 3 and 4, and Objections to Definitions Nos. 1 and 2. Chrysler also objects to Information Request No. 5 to the extent it is intended or could be construed by any person or entity to be an admission that the acts or omissions of Jeep's employees, contractors, or agents caused a release or threat of release of hazardous substances, pollutants or contaminants at the Stickney Landfill Site. However, should it be determined by a judicial or similar body that agents, contractors or employees of Jeep caused or contributed to a release or threat of release of hazardous substances, contaminants or pollutants at the Stickney Landfill Site, nothing in this Response is intended or shall be construed as a waiver of any rights of contribution, indemnification or other recovery that may exist in law or equity against such agent, contractor or employee. Chrysler further objects to this Information Request to the extent that it is intended or deemed to serve as an admission that there are any "damages" associated with the Stickney Landfill Site. Given that U.S. EPA is only initiating a basic fact-finding inquiry, it is premature and beyond the authority of U.S. EPA to make the legal conclusion that there are any "damages" associated with the Stickney Landfill Site.

Response: Without waiving the foregoing Objection, see the August 1984 104(e) Response. In addition, upon information and belief, in 1988 an employee of Chrysler observed

certain City of Toledo contractors, without authorization from Chrysler, placing materials believed to be stone, asphalt or crushed rock at the Stickney Landfill Site. Upon observing such activity, Chrysler immediately notified the appropriate City of Toledo officials and the unauthorized activity was halted.

Request No. 6: Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors, or by prior owners and/operators.

Objection: See General Objections Nos. 1, 2, 3 and 4, and Objections to Definitions Nos. 1 and 2. Nothing in this Response is intended as an admission that hazardous substances, pollutants, contaminants, or solid wastes were disposed of at the Stickney Landfill Site by Chrysler, its contractors, agents, or employees.

Response: Without waiving the foregoing Objection:

Kent V. Klem
Production Engineering Manager
Chrysler Corporation
1000 Jeep Parkway
Toledo, Ohio 43657
(419) 470-7108

Richard Mieszczak
Environmental & Energy Affairs
Chrysler Corporation
12000 Chrysler Drive
Highland Park, Michigan 48288-0001
(313) 956-4701

James A. Carlson
Manager, Facilities Closure
Chrysler Corporation
12000 Chrysler Drive
Highland Park, Michigan 48288-0001
(313) 956-0884

Marilyn Bladel
Environmental Control
Chrysler Corporation
1000 Jeep Parkway
Toledo, Ohio 43657
(419) 470-7292

See also the August 1984 104(e) Response.

Request No. 7: Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified "no", identify:

- a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;
- b) Who supplied you with such hazardous substances;
- c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
- d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
- e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Objection: See General Objections Nos. 1, 2, 3 and 4, and Objections to Definitions Nos. 1 and 2. In addition, Chrysler objects to providing documents or information regarding every hazardous substance or material ever present in some form, even limited to Kaiser-Jeep Plant No. 1 or Kaiser-Jeep Plant No. 2. As noted in General Objections No. 2, Chrysler's only involvement with the Stickney Landfill Site has been limited to that of title holder since 1987, and American Motors Corporation's only involvement with the Stickney Landfill Site was limited to that of title holder when it acquired legal title to the Stickney Landfill Site in 1975. As indicated in the August

1984 104(e) Response, the Stickney Landfill Site has been closed to all users since 1966. Chrysler also objects to Information Request No. 7 because there is no reasonable connection between the hazardous substances used in the manufacturing processes at Kaiser-Jeep Plant No. 1 and Kaiser-Jeep Plant No. 2 and the hazardous substances that may be present at the Stickney Landfill Site. Although hazardous substances are used in the manufacturing processes at Kaiser-Jeep Plant No. 1 and Kaiser-Jeep Plant No. 2, any hazardous wastes from those facilities were disposed of at locations other than the Stickney Landfill Site, and, consequently, there is no reasonable connection between Kaiser-Jeep Plant No. 1, Kaiser-Jeep Plant No. 2 and the Stickney Landfill Site. In addition, the difficulty of providing the information sought in Information Request No. 7 with respect to Kaiser-Jeep Plant No. 1 and Kaiser-Jeep Plant No. 2 is exacerbated by the passage of over forty years, by the turnover in employees, and by the corporate mergers to which Chrysler and Jeep have been a party. Furthermore, records of hazardous wastes were not documented in a way equivalent to the present manifest system established by RCRA in 1976. Also, details of vendors and handlers were generally not archived, nor were records relating to purchase dates and quantities of hazardous substances or materials. Chrysler objects to this Information Request to the extent that it purports to request a blanket identification of every hazardous substance or material present at Kaiser-Jeep Plant No. 1 or Kaiser-Jeep Plant No. 2 over a period of years. Possessing, handling, purchasing or using a hazardous substance or material is simply not the same as disposing of it; and listing such hazardous substances or materials used in a process or operation does not necessarily indicate the nature of the resulting products and wastes or their disposal.

Response: Without waiving the foregoing Objection, processes that occur at Kaiser-Jeep Plant No. 1 and Kaiser-Jeep Plant No. 2 include pressing automobile body parts, finishing body parts, painting and trimming body parts, assembling chassis and final assembly of vehicles. Various substances are or were used in the manufacturing processes of the automobiles, including alcohol

wipes for surface wipe, adhesives for hood pads, glass urethane, solvents, paints used in the painting process, oil, anti-freeze, brake fluid, clutch fluid, power steering fluid, transmission fluid, engine anti-freeze, windshield solvent and underbody water-based coating for undercoating. Sometimes some of these substances become wastes. Hazardous wastes at Kaiser-Jeep Plant No. 1 and Kaiser-Jeep Plant No. 2 are manifested and disposed of offsite.

Request No. 8: Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. In addition, identify the following:

- a) The persons with whom you or such other persons made such arrangements;
- b) Every date on which such arrangements took place;
- c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance;
- d) The owner of the waste materials or hazardous substances so accepted or transported;
- e) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- f) All tests, analyses, and analytical results concerning the waste materials;
- g) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- i) Whether the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;

- j) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- k) What was actually done to the waste materials or hazardous substances once they were brought to the Site;
- l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substances involved in each transaction;
- n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
- o) The price paid for (i) transport or (ii) disposal of (iii) both, of each waste material and hazardous substance;
- p) All documents containing information responsive to a) - o) above, or in lieu of identification of all relevant documents, provide copies of all such documents;
- q) All persons with knowledge, information, or documents responsive to a) - o) above.

Objection: See General Objections Nos. 1, 2, 3 and 4, and Objections to Definitions Nos. 1 and 2. See also Objection and Response to Information Request No. 7. Nothing in this Response is intended as an admission that hazardous substances, pollutants, contaminants, or solid wastes were disposed of at the Stickney Landfill Site by Chrysler, its contractors, agents, or employees.

Response: Without waiving the foregoing Objection, see the August 1984 104(e) Response.

Request No. 9: Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing,

treating, disposing, or otherwise handling hazardous substances or materials at the Site.

Objection: See General Objections No. 1, 2, 3 and 4. See also Objections to Definitions Nos. 1 and 2. See also **Objection and Response** to Information Request No. 7. Chrysler also objects to Information Request No. 9 because it is vague.

Request No. 10: State the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g., deeds, leases, etc.).

Objection: See General Objections No. 1, 2 and 3, and Objections to Definitions Nos. 1 and 2. See also Objection to Information Request No. 7.

Response: Without waiving the foregoing Objection, Chrysler acquired legal title to the Stickney Landfill Site in 1987 when American Motors Corporation became a wholly-owned subsidiary of Chrysler. See also the August 1984 104(e) Response.

Request No. 11: Provide information about the Site, including but not limited to the following:

- a) Property boundaries, including a written legal description;
- b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);
- c) Surface structures (e.g., buildings, tanks, etc.);
- d) Ground water wells, including drilling logs;
- e) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied;
- f) Any and all additions, demolitions or changes of any kind on, under or about the Site, its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the site; and
- g) All maps and drawings of the Site in your possession.

Objection: See General Objections No. 1, 2 and 3, and Objections to Definitions Nos. 1 and 2.

Response: Without waiving the foregoing Objection, the Stickney Landfill Site, as that term is used herein, is that certain parcel of real estate comprising approximately 32 acres, as delineated on the map attached as Exhibit 1, and legally described as follows:

All of that part of the southeast 1/4 of Section 13, Town 9 south, Range 7 east, in the CITY of TOLEDO, LUCAS COUNTY, OHIO, lying southeasterly of the southeasterly line of Windermere Boulevard, the said southeasterly line of Windermere Boulevard being a line that is uniformly 75 feet distant southeasterly from the center line of the said Windermere Boulevard and which center line is described as follows:

Beginning at a point in the southerly line of the said Section 13 that is 1833.47 feet westerly of the southeasterly corner of the said Section 13; thence northeasterly, along a line that forms an angle of 61 degrees and 2 minutes with the said southerly line of Section 13, a distance of 227.44 feet to a point of curve; thence continuing northeasterly, along a circular curve to the right having a radius of 1332.77 feet, a distance of 772.3 feet to a point of tangent; thence continuing northeasterly, along a line drawn tangent to the last described curve, a distance of 297.53 feet to a point of curve; thence continuing northeasterly, along a circular curve to the left having a radius of 716.78 feet, a distance of 500.4 feet to a point of tangent; thence continuing northeasterly, along a line drawn tangent to the last described curve, a distance of 64.2 feet to a point of curve; thence continuing northeasterly and northerly, along a circular curve to the left having a radius of 955.4 feet, a distance of 400.2 feet to a point of tangent; thence continuing northerly, along a line drawn tangent to the last described curve, a distance of 302.5 feet, more or less, to a point of curve; thence northeasterly, along a circular curve to the right having a radius of 287.9 feet, a distance of 461.4 feet, more or less, to a point of tangent that is in a line drawn at right angles to the easterly line of the said Section 13 at a point which is at a distance of 2279.2 feet northerly of the said southeast corner of Section 13; thence easterly, along the said line drawn tangent to the last described curve, a distance of 216.3 feet, more or less, to the said point in the easterly line of Section 13 which point is at a distance of 2279.2 feet northerly of the southeast corner of Section 13.

Excepting from all of the above described premises that part thereof lying southerly of a line 250 feet northerly of and parallel with the southerly line of said Section 13.

Also excepting therefrom the following described real estate: A parcel of land situated in the southeast 1/4 of Section 13, Town 9 south, Range 7 east, in the City of Toledo, Lucas County, Ohio, bounded and described as follows:

Beginning at a point on the east line of said Section 13 which is 600.00 feet southerly from the east and west center line of said Section 13 as measured along the said east line of Section 13; thence westerly 230.00 feet along a line drawn normal to the said east line of Section 13 to a point; thence along a line deflecting 90 degrees to the left and south 200.00 feet to a point, thence along a line deflecting to the left and east, 230.00 feet to a point on the east line of said Section 13; thence northerly 200.00 feet along the east line of said Section 13 to the point of beginning, containing approximately 1.056 acres of land, more or less, and subject to all legal highways.

See also the August 1984 104(e) Response.

Request No. 12: Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the Site. For each such solid waste unit identified, provide the following information:

- a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
- b) The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;
- c) The dates that the unit was in use;
- d) The purpose and past usage (e.g., storage, spill containment, etc.);
- e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit; and
- f) The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit.
- g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions Nos. 1 and 2.

Response: Without waiving the foregoing Objection, see the August 1984 104(e) Response.

Request No. 13: Identify the prior owners of the Site. For each prior owner, further identify:

- a) The dates of ownership;
- b) All evidence showing that they controlled access to the Site; and
- c) All evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Site during the period that they owned the Site.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions Nos. 1 and 2.

Response: Without waiving the foregoing Objection, see the August 1984 104(e) Response.

Request No. 14: Identify the prior operators, including lessors, of the Site. For each such operator, further identify:

- a) The dates of operation;
- b) The nature of prior operations at the Site;
- c) All evidence that they controlled access to the Site; and
- d) All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Site and/or its solid waste units during the period that they were operating the Site.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions Nos. 1 and 2.

Response: Without waiving the foregoing Objection, see the August 1984 104(e)

Response.

Request No. 15: Provide copies of all local, state and federal environmental permits ever granted for the Facility or any part thereof (e.g., RCRA permits, NPDES permits, etc.).

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions

Nos. 1 and 2. See also Objection and Response to Information Request No. 7.

Request No. 16: Did the Facility ever have "interim status" under the Resource Conservation or Recovery Act (RCRA)? If so, and the Facility does not currently have interim status, describe the circumstances under which the Facility lost interim status.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions

Nos. 1 and 2. See also Objection and Response to Information Request No. 7.

Request No. 17: Did the Facility ever file a notification of hazardous waste activity under RCRA? If so, provide a copy of such notification.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions

Nos. 1 and 2. See also Objection to Information Request No. 7.

Request No. 18: Provide all reports, information or data related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions

Nos. 1 and 2.

Response: See the August 1984 104(e) Response.

Request No. 19: Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the Site? If so, identify:

a) What the nature and scope of these investigations will be;

- b) The contractors or other persons that will undertake these investigations;
- c) The purpose of the investigations;
- d) The dates when such investigations will take place and be completed; and
- e) Where on the Site such investigations will take place.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions

Nos. 1 and 2.

Response: Without waiving the foregoing Objection, no.

Request No. 20: Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred at or from the Site. In addition, identify:

- a) When such releases occurred;
- b) How the releases occurred;
- c) The amount of each hazardous substances, pollutants, or contaminants so released;
- d) Where such releases occurred;
- e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release.
- f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; and
- g) All persons with information relating to these releases.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions

Nos. 1 and 2.

Response: Without waiving the foregoing Objection, see the August 1984 104(e)

Response.

Request No. 21: Did any leaks, spills or releases of hazardous materials occur on the Site when such materials were being:

- a) Delivered by a vendor;
- b) Stored (e.g., in any tanks, drums, or barrels);
- c) Transported or transferred (e.g., to or from any tanks, drums, barrels, or recovery units); or
- d) Treated.

Objection: See General Objections Nos. 1, 2 and 3, and Objections to Definitions Nos. 1 and 2.

Response: Without waiving the foregoing Objection, Chrysler is without information sufficient to provide a Response to this Information Request. See also the August 1984 104(e) Response.

VERIFICATION

I, Sheldon A. Zabel, state that I am an attorney representing Chrysler Corporation in connection with the U.S. EPA's information request pursuant to Section 104(e) of CERCLA dated April 14, 1993 for the Stickney Avenue Landfill Site, and based on information provided by people knowledgeable in this matter, a diligent record search has been completed in order to answer the information requests. I further state that present and former employees who may have knowledge of the information sought in the requests have been interviewed to the extent that they have been identified and located.

Sheldon A. Zabel
Schiff Hardin & Waite
7200 Sears Tower
Chicago, Illinois 60606

Subscribed and sworn to before
me this ____ day of _____, 1993.

RECEIVED

JUN 9 2 1993

U.S. EPA REGION V
OFFICE OF REGIONAL COUNSEL